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VIA ECF

Hon. Phillip M. Halpern
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Application granted. Defendants' pre-motion letter shall be filed on April 26, 2021; Plaintiff's opposition shall be filed on May 3, 2021.

SO ORDERED

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
April 23, 2021

Re: *Emanuel v. Gap, Inc., et al.*
Case No.: 19-cv-03617-PMH-AEK

Dear Judge Halpern:

We represent Defendants Gap, Inc., Banana Republic, LLC, Michelle Russo, Toni Lynn Borowski and Gregoire Jean-Louis (collectively "Defendants") in connection with the above-referenced matter.

We write this letter on Plaintiffs' behalf, as Plaintiffs' counsel has advised that he is currently undergoing technical difficulties, for which he apologizes to the Court. As your Honor is aware, Defendants intend to file a motion for summary judgment in this matter, and our pre-motion conference letter is due to the Court tomorrow, April 23, 2021. Due to Plaintiffs' technical issues, Plaintiffs are unable to provide its opposing 56.1 Statement to Defendants until tomorrow morning. Defendants need additional time to review Plaintiffs' statement prior to the submission of our letter.

Accordingly, the parties request that the date for Defendants' submission of their pre-motion letter be extended to April 26, 2021, and the date for Plaintiff's opposition be extended to May 3, 2021. This will be the parties' final request for an extension.

Both parties remain available for the telephonic conference scheduled before Your Honor on May 17, 2021 at 12:00 pm.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Jean L. Schmidt

Jean L. Schmidt
cc: Parisis G. Filippatos, Esq.